

## **DECLARATION OF C.B.**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

MAXWELL KADEL, *et al.*,

*Plaintiffs,*

v.

DALE FOLWELL, in his official capacity as  
State Treasurer of North Carolina, *et al.*,

*Defendants.*

No. 1:19-cv-00272-LCB-LPA

**DECLARATION OF C.B.**

I, C.B., do hereby state as follows:

1. The initials of my legal name are C.B. I am a plaintiff in the above-captioned action. I have actual knowledge of the matters stated in this declaration.
2. I am a boy.
3. I am 16 years old. I was born and raised in Chapel Hill, North Carolina and currently live there with my family.
4. I am transgender, which means that I was designated “female” at birth, even though I am and identify as male.
5. I am a junior in high school. I enjoy swimming, video games, cars, and hanging out with my friends. In school, I particularly enjoy studying psychology and while I have not yet decided what I will study in college, I am considering psychology as a possible career path.

6. Ever since I was a young child, I have known that I am boy. I was always uncomfortable wearing stereotypically female clothing and would try to dress in a more masculine manner. For example, as a child, I recall refusing to go to school one day because my mom wanted me to wear jeans that had pink stitching on them, which made them feel like girl's jeans. I also recall since I was six or seven years old, refusing to wear stereotypically female swimming suits, opting instead to wear board shorts and a shirt.

7. In late 2016, when I was 11 years old, I began to wear a short, typically masculine haircut, which made me feel more like myself.

8. Knowing that I am a boy, in January 2017, while I was in sixth grade, I recall telling my mom that "I'm not a girl."

9. My mom was supportive and asked me if I wanted to tell my dad and my sister, which I asked her to do on my behalf.

10. After I came out to my parents and informed them that I am transgender, my parents and I began meeting with a therapist in the Spring of 2017.

11. At the time, I was anxious about beginning female puberty, so after consultation with my parents and therapist, I asked to be placed on treatment to delay puberty.

12. During the summer of 2017, I began living as male by informing friends and family of my male gender identity and my new more typically male name, wearing traditionally masculine clothes, and living openly as the boy I am.

13. However, as my chest began to develop, I began to experience additional anxiety.

14. In August 2017, I met a team of medical and mental health professionals at the Duke Gender Clinic, where I was diagnosed with gender dysphoria and was prescribed puberty delaying medication, which was delivered through an implant. The implant lasts about 18 months.

15. The treatment of my gender dysphoria has helped reduce my anxiety, and I feel more comfortable knowing I am developing consistent with who I am.

16. In the Spring of 2018, I legally changed my name to the more typically masculine name that I currently have. Soon after I got a U.S. passport that accurately reflects who I am by having a male sex designation. My driver's license, which I obtained later, also reflects the same.

17. As the year 2019 and the 18-month period for my implant approached, I recall observing my parents worry about how they would pay for my medical care.

18. My parents, who love and support me, have gone to great lengths to shield me from any discrimination, but as I have grown older, that discrimination has become more apparent to me.

19. For example, I am aware that the reason I observed my parents worrying about how they would pay for my care is because the North Carolina State Health Plan for Teachers and State Employees, in which I am enrolled through my father, excludes



coverage of gender-confirming care. It made me feel unhappy and really bad to see my parents experience stress over how they would pay for my care.

20. As a result of the Health Plan's exclusion, not only did my parents have to spend a lot of money, but in early 2019, I was forced to switch from the implant to injection shots as a form of puberty delaying medication. Switching from the implant to shots caused me a great deal of frustration, not only because the injections were painful, but because I also ended up developing cysts as a result of the injections on two separate occasions.

21. In March 2019, I also began taking testosterone as hormone therapy for my gender dysphoria. Hormone therapy has brought me a great deal of relief. For example, I am happy with my voice and the fact that I have to shave now.

22. It is my understanding that the Health Plan refuses to cover my hormone therapy as treatment for my gender dysphoria.

23. It makes me feel bad knowing that a whole group of people, including myself, are being discriminated against for something that they cannot control, being transgender. It makes me feel like we are being treated as different and less than.

24. For as long as I can remember, I have always felt gender dysphoria which I understand to be discomfort and distress due to my body not matching who I am. This dysphoria also causes me anxiety. However, the treatment for gender dysphoria with puberty delaying medication and now hormones, has reduced that anxiety and helped me feel better.

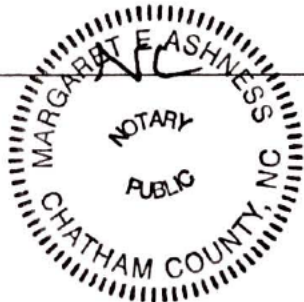
I declare under the penalty of perjury that the foregoing is true and correct.

Dated this 24 day of November, 2021.

CMB  
~~\_\_\_\_\_~~ C.B.  
\_\_\_\_\_  
C.B.

Subscribed and sworn before me, a Notary Public in and for the Chatham County,

State of NC, this 24 day of November, 2021.



Margaret E. Ashness  
Signature of Notary  
5/12/2026